Programmatic Permit Guidance

Ferry Terminal Paint-Prep Washing and Blasting General HPA GH-D9448-01, Appendix G General NPDES WA-0039039, Section S1.D Army Corps Exemption

This guidance will help you interpret and understand the roles and responsibilities for complying with programmatic permits and exemptions for **ferry terminal paint-prep washing and blasting**. You must read the permits prior to conducting work. Only familiarity with the permits will ensure your activities maintain compliance. The permits and referenced documents are available for download at WSDOT's programmatic permit website http://www.wsdot.wa.gov/environment/Programmatics/default.htm.

Programmatic permits and exemptions

General Hydraulic Project Approval
General NPDES
GH-D9448-01, Appendix G
WA-0039039, Section S1.D

• Army Corps of Engineers Exempt

Work covered:

Appendix G and section S1.D allow ferry terminal painting, dry paint-prep cleaning, pressure washing, abrasive blasting, and marine growth removal. Debris and paint collection and wash-water filtration structures are required. Subject to the restrictions below, filtered wash-water may enter state waters.

Work not covered:

Appendix G and S1.D <u>do not allow</u> work below the Ordinary High Water Line (OHWL) (except for a temporary floating platform for marine growth removal¹) nor work that affects the bed of state waters.

When and how often work is allowed:

Pressure washing is limited to the weeks of maximal tidal exchange (spring tide) at the time of maximum daily the tidal flows and when the water is at least 5 feet deep under the part of the structure being washed. If the project will shade aquatic plants for longer than 72 hours, then the shading part of the work shall occur between October 1 and April 30.

Work restrictions:

Appendix G and S1.D specify restrictions and required practices that minimize the disturbance of vegetation and amount of pollutants entering the water. **Notable restrictions** include the following:

- An acute mixing zone is authorized for pressure washing discharges. The zone is limited to twenty feet around the point of discharge.
- No more than 6 pressure washers operating at any one time.
- Wash-water discharges <u>are allowed</u> to state waters if filtered through a #100 sieve (minimum) tarp.

¹ Discrepancy between NPDES and GHPA permits---NPDES does not allow platform but for marine growth removal. GHPA allows floating platform and marine growth removal. Ecology is reviewing the discrepancy.

Permit questions?

Gregor Myhr (360) 705-7487 Permit Program Manager WSDOT, Environmental Services Office

Reporting requirements:

Complete and accurate reporting of all work covered by this permit is a legal requirement.

Report Planned Projects to Headquarters—

• On or before January 10—Ferries must submit a list of ferry transfer spans paint-prep projects during the year, including schedule and mitigation measures, to the Environmental Services Office (ESO). ESO will add any planned monitoring or special studies and forward the list to Ecology by January 31 of each year per condition S3.B of the NPDES permit. The list must be submitted at least 90 days prior to conducting paint-prep activities.

Pre-project notification—

• **3 Days** or more before starting work—notify the WDFW Regional Habitat Program Manager (RHPM) and Ecology's Regional water quality staff by letter or fax. The RHPM contact list is available at the programmatic permit website (click on the *documents referenced in permits* quick link). Ecology contacts are listed below. Information that must be included in the notifications is found in Appendix G and section S3.A of the permits. For assistance generating lat/long coordinates, call the WSDOT Environmental Information Program at (360) 705-7476.

Annual project reporting—The following process shall be followed to ensure proper annual reporting of completed projects:

- **How to report** Ferries must submit a Programmatic Permit Reporting Form to ESO (form and directions available at the programmatic permit website).
- What to report Fill out the required fields on the Programmatic Permit Reporting Form. When reporting, ferries staff can recommend improvements to BMPs and mitigation: This is the best way to rid our toolbox of BMPs that do not work and add BMPs that work better. Appendix G and S3.B, specify information the WSDOT Environmental Services Office (ESO) must submit to the WDFW Habitat program and Ecology SEA program in the annual report.
- When to report Annual project reports are submitted to WDFW and Ecology by January 31 through ESO. ESO will submit a report even if no work was done. In order to meet this deadline, project reports must be completed by January 10.

Emergency reportingDistressed or dead fish and water quality problems must be reported to the regional WDFW and Ecology offices below.

Ecology Regional Contact Information:

Ecology Regional Contact Information:	
Southwest Region	Northwest Region
P.O. Box 47775	3190 160th Ave SE
Olympia, WA 98504-7775	Bellevue, WA 9808-5452
Fax # 360-407-6305	Fax # 425-649-7098
Deborah Cornett - supervisor for water quality	Don Seeberger - Unit Supervisor for the Water Quality
inspectors/construction	Inspectors/Construction
dcor461@ecy.wa.gov. 360-407-7269	dsee461@ecy.wa.gov. 425-649-4424
Margaret Hill - water quality inspector	John Drabek - supervisor for the water quality
mhil461@ecy.wa.gov. 360-407-0246	inspectors/industrial unit
Janet Boyd - water quality inspector	Note - John's group works pretty closely with Don's group - some
jboy461@ecy.wa.gov. 360-407-0245	overlap so John is listed more of a backup but should be included
	in all e-mail notifications, jdra461@ecy.wa.gov. 425-649-7293
Betsy Dickes - water quality inspector	•
bedi461@ecy.wa.gov. 360-407-6283	
Rusty Post - water quality inspector (Vancouver field office)	
rpos461@ecy.wa.gov. 360-690-4787	
Central Region	Eastern Region
15 West Yakima Ave Suite 200	N 4601 Monroe
Yakima, WA 98902-3452	Spokane, WA 99205-1295
Fax # 509-575-2809	Fax # 509-329-3570
Jeff Lewis - supervisor for water quality inspectors	Lenox Bramble (called Len) - supervisor for water quality permit
jlew461@ecy.wa.gov. 509-454-7207	writers
	lbra461@ecy.wa.gov.
Ray Latham - water quality inspector	509-329-3504
rlat461@ecy.wa.gov. 509-575-2807	
	Mike Hepp - water quality inspector
Terry Whittmeier	mhep461@ecy.wa.gov.
twit461@ecy.wa.gov. 509-574-3991	509-329-3536

Department of Fish and Wildlife Contact Information:

Region 1 – Spokane: 509-456-4082	Region 4 – Mill Creek: 425-775-1311
Region 2 - Ephrata: 509-754-4624	Region 5 – Vancouver: 360-906-6700
Region 3 – Yakima: 509-575-2740	Region 6 – Montesano: 360-249-4628